

REMARKS

Claims 1 to 3 were pending in the application at the time of examination. Claims 1 to 3 stand rejected as obvious.

Applicants respectfully note that no 112 rejection of the claims were presented in the action. Applicants have amended Claim 1 to 3 to correct grammatical informalities and obtain consistent recitation of claim elements. Accordingly, these amendments do not affect the patentability of the claims and do not require consideration of new issues or a new search.

Claims 1 to 3 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0184507, hereinafter referred to as Makower. The rejection admitted that Makower failed to teach or suggest "a user authentication peer group," and then stated:

. . . for Makower to have allowed for the federation servers to have the capability to not only be a part of the identification server peer group but to also provide for the ability to be a part of a user authentication group that also authenticates and since, Makower does teach mapping as well as authentication done by the federation of web servers which also includes a server id as well as a random ID. By this rationale **claim 1** is rejected. (Emphasis in original.)

Applicant notes that no motivation has been provided for the modification made in the rejection. The MPEP directs:

The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination.

MPEP § 2142.01, 8th Ed., Rev. 2, p. 2100-131 (May 2004).

Thus, Applicants respectfully submit that a prima facie obviousness rejection has not been established. Moreover, as described more completely below, the proposed modification is

taught away from by Makower and would eliminate the intended purpose of Makower in using a centralized server for authentication. According to the MPEP, both of these factors are indicia of non-obviousness.

Makower taught that there are two possibilities for authentication that are determined by a central server: (1) the client browser is not recognized by the central server; and (2) the client browser is recognized by the central server.

Specifically, Makower first taught:

. . . if the central sign-on server 32 does not recognize the client browser 42 via a cookie, the central sign-on server 32 creates a cookie with a new, unique value (step 404). Additionally, the central sign-on server 32 creates an entry on a local table located on the central sign-on 32 server using the newly created cookie and the web server 20 server identification as a concatenated primary key (step 406). The central sign-on server 32 then redirects the client browser 42 back to the web server 20 (step 410). . . .

Makower, Paragraph [0031]

This explicitly states that "a cookie" is used to determine whether the client browser is recognized and not the randomized ID cited by the Examiner in determining whether to authenticate the user. Moreover, the mapping described is not between "said identification randomized ID and user information." These authentication actions, the recognition and mapping, are performed on the central sign-on server and not the web server 20 of Makower.

Next, Makower taught:

. . . the client browser 42 responds to the redirect by sending a request to the web server 20 as directed. Receiving the message, including the query string parameters indicating that there is no current session, the web server 20 prompts the client browser 42 with a log-in page (step 412). The client browser 42 provides authentication information in whatever way is appropriate such as by, for example, a log-in identification and

password, unlocking a digital certificate with a pass key, etc. (step 414). The client browser 42 sends the authentication information to the web server 20, and the web server 20 creates a new session for the client (step 416).

Makower, Paragraph [0032]

Thus, if the authentication is not provided by the central server upon finding the cookie, a routine log-in is used by the web server to make the authentication. There is no teaching of any mapping associated with the authentication. The absence of any teaching of a mapping associated with the authentication by the web server teaches away from both Applicants' invention as recited in Claim 1 and the proposed modification to Makower used in the rejection.

As noted above, the modification proposed in the rejection is not supported by any teaching in the reference and would change the way that Makower works. It would require modifying both the central server functionality and the functionality of the federation of servers of Makower because according to the rejection the central server authentication functionality would be moved to the federation of servers of Makower and a new mapping would be added in the authentication done by the web server. The explicit teaching of using a central server and the advantages associated with such use in Makower teach away from the proposed modifications to Makower.

The reference specifically described how the authentication was performed in all circumstances and so in view of this teaching, those of skill in the art would have no motivation to modify the reference in some arbitrary way just to arrive at Applicants' invention as recited in Claim 1. Applicants request reconsideration and withdrawal of the obviousness rejection of Claim 1.

Claim 2 is a program storage device corresponding to method Claim 1 and thus includes substantially the same distinctive feature as Claim 1. Claim 3 is a means-plus-function claim corresponding to method Claim 1 and thus

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includes substantially the same distinctive feature as Claim 1. Accordingly, the above comments with respect to Claim 1 are incorporated herein by reference for Claims 2 and 3.

Applicants request reconsideration and withdrawal of the obviousness rejection of each of Claims 2 and 3.

Claims 1 to 3 remain in the application. Claims 1 to 3 have been amended. For the foregoing reasons, Applicant(s) respectfully request allowance of all pending claims. If the Examiner has any questions relating to the above, the Examiner is respectfully requested to telephone the undersigned Attorney for Applicant(s).

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on May 9, 2005.



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May 9, 2005
Date of Signature

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